

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2019 SEP 27 A 9 29

STEPHEN C. DRIES  
CLERK

## COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Clarence Albert Saffold III

v.

Case Number:

**19-C-1414**

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Milwaukee County Jail

Wellpath

G4S Transportation

### A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at  
(State)

Dodge Correctional Institution PO Box 700 Waupun, WI 53983  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Milwaukee County Jail  
(Name)

is (if a person or private corporation) a citizen of Wisconsin

### Defendant WellPath

is (if a person or private corporation) a citizen of Wisconsin  
and (if a person) resides at unknown  
and (if the defendant harmed you while doing the defendant's job)  
worked for Milwaukee County Jail 949 North 9th Street Milw, WI 53233

State

Address

### Defendant G4S Transportation

is (if a person or private corporation) a citizen of Wisconsin  
and (if a person) resides at unknown  
and (if the defendant harmed you while doing the defendant's job)  
worked for Milwaukee County Jail 949 North 9th Street Milw, WI 53233

State

Address

and (if a person) resides at Un Known (State, if known)  
(Address, if known)  
and (if the defendant harmed you while doing the defendant's job)  
worked for un Known  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On 7/11/19, between the times of 2pm and 5pm. I  
was in the possession of G4S workers C. Gilbert and J.  
Sanchez. I was injured while in their possession when two  
things occurred: At the (Eye Institute) Froedert Hospital, I  
was placed into a wheelchair due to handcuffs/shackles  
for easier mobility I was told. While in wheelchair C. Gilbert  
maneuvered the wheelchair I was in into the wall when  
entering the elevator. As a result my foot was banged  
and twisted in the process. As well while being transported  
back to Milwaukee County Jail, I wasn't secured in the vehicle  
by another officer, for the record I could not due to handcuffs.

As a result of me not being secured and their reckless driving I was tossed around in the vehicle and I hit my head twice on the vehicle's rear window. Upon arrival back at the jail I asked both officers to report my reported injuries to jail's medical staff so I could be assessed and treated but instead they escorted me back to my housing unit and departed. After returning me I had to wait till we arrived at my housing unit. This all occurred between the time of 2pm-5pm on 7/11/19. I believe this all occurred due to their carelessness and recklessness when performing their job duties, as well as the need to end their jobs and end their work shifts.

On the following dates I was ignored and/or denied medical assistance when asked due to injuries sustained on 7/11/19 (which will be listed further into complaint): 7/11/19 5:15pm Officer Peterson denied me assistance until it was highly visible that I was agitated at his hesitation to contact Health Services (after my third time complaining). On 7/12 2:30pm I asked Officer Young to call a "Medical Emergency" after reporting dizzy spells, neck/head trauma, and foot pain (result of injuries 7/11/19) but instead she left and ended her shift. On 7/14/19 11:56pm I reported

(See attachments)

that my neck had become stiff and that now my back was hurting. I asked him to call medical staff for me but instead he told me, exactly his words "Medical won't do anything because it isn't 'cardiac, diabetic, or seizure' related, sorry". I believe each officers failure to provide me access to the jail's medical staff were them evading the "meticulous paper work" they all joke about not wanting to do as well as I'm an inmate so my reporting of medical issues is incredible.

Wellpath failed to assess and attend my injuries sustained of 7/11/19 which were: foot trauma (collision and twisting/bending), head trauma (colliding twice with vehicles rear panels) and neck strain (whiplash from being jerked and bounced around during transportation) neck strain progressed into back due to unattendance and failure to treat in timely manner by medical staff.

On 7/11/19 7:00pm Nurse Brittany came and I reported injuries to her. All I received was an ace bandage to wrap up my foot and a promise to be seen at clinic the following day. I contacted staff through slips provided reporting status of injuries and as well asking for medical attention. On 7/13 1:15am roughly I finally received attention but was only given a dosage of Ibuprofen and again promises to be seen by staff at clinic. On 7/14 I was assessed by Dr. Khan. He told me exactly: My head injury wasn't anything because it occurred days ago, don't worry about a concussion, My neck injury as well was not efficient enough to be considered a problem, My foot injury was probably a strain no worries. He wrapped my foot in an ace bandage and told me I would receive pain medication. I did not receive these meds until many days later after I complained about not receiving anything for my pain to Nurse Marshall. I asked for X-rays, I begged for medication, I reported all persisting pains (progressing neck pain that went into my back). On 8/6/19 Nurse Brittany came to speak with me after receiving grievances. She stated she didn't think I needed X-rays. As well stated she didn't see any complaints I made/filed. On 8/7/19 I was seen by Doctor Elise. She stated no one made any reports of my head/neck injuries and stated my back pain may be muscular. She scheduled me for a physical therapy

and promised me a X-ray the following day 8/8/19. I received physical therapy on 8/12/19. The therapy lady stated it was for my back and not foot. I finally as well received my first X-ray on 8/13/19. I was not provided a X-ray of my head/neck/back to analyze and find the problem first before being provided physical therapy as a solution. I was injured on 7/11/19 and I received my first X-ray of 8/13/19 after being denied wheelchairs and crutches to aid mobility due to inability to due to injuries. Still today 8/26/19 I have yet to receive X-ray of my back/neck/head. This all occurred while being held at Milwaukee County Jail between the dates of 7/11/19 - currently. I believe I was neglected proper medical assistance because I am an inmate and it is believed that some fake injuries for other reasons. I sustained these injuries as a result of other authority figures carelessness and inconsideration when doing their jobs. Now I cannot ascend nor descend stairs without assistance, as well I have extreme back pain that result from my neck injuries going unattended for so long. And I am still being denied proper medical services currently. Additionally: I have left the facility (now at Dodge Correctional Institution) and Wellpath failed to communicate injuries so that I could receive treatment (9/3/19 - currently). I've asked them and have consented to the release of medical records which they still are withholding (9/18/19). Due to such I'm unable to receive diligent medical assistance at new facility due to the lack of verification of injuries sustained on 7/11/19.



C. JURISDICTION

☐ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$1,000,000.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I want to be awarded said money to assist my medical  
expenses, aid my rehabilitation (if possible), and to provide for my  
children in the meantime while I aim for rehabilitation. I  
want Milwaukee County Jail, G4S Transportation, and Wellpath  
to award money. I ask that all parties (defendants) be  
spoke to by higher officials about them not following  
Legislative DOC 350.01 - 350.35 Procedural Manual for  
Sheriff Department.

E. JURY DEMAND

I want a jury to hear my case.

☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 18<sup>th</sup> day of September 2019.

Respectfully Submitted,

Clarence Saffold  
Signature of Plaintiff

2019012932  
Plaintiff's Prisoner ID Number

Dodge Correctional Institution

PO Box 700 Waupun, WI 53963-0700  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.